

Title VI Compliance Reviews



U.S. Department
of Transportation
**Federal Aviation
Administration**

Office Of Civil Rights

*ACHIEVING SAFETY
THROUGH DIVERSITY*

Presented to: National Civil Rights Training
Conference For Airports

Prepared by: Airport Nondiscrimination
Compliance Program

Date: August 11, 2015



Agenda

- Purpose
- Goal and Authority
- Factors for Selection
- Prior to Site Visit
- During Site Visit
- After Site Visit - FAA
- After Site Visit - Airport Sponsor
- Sample Compliance Review Summary Table
- FAA Title VI Program Staff

Purpose

- To walk you through a typical Title VI compliance review and dispel any misconceptions/ or apprehensions you may have
- To prepare you for what you can expect, WHEN (not if), a compliance review is conducted at your airport

Goal and Authority

Goal:

- To assist and make certain Recipients (Airports) of FAA Federal funding from the FAA are in compliance with:
 - Title VI of the Civil Rights Act of 1964
 - 49 CFR Part 21
 - 49 U.S.C. 47123
 - Executive Order 13166 (LEP)
 - Executive Order 12898 (EJ)

Authority:

- 49 CFR Part 21.11(a)

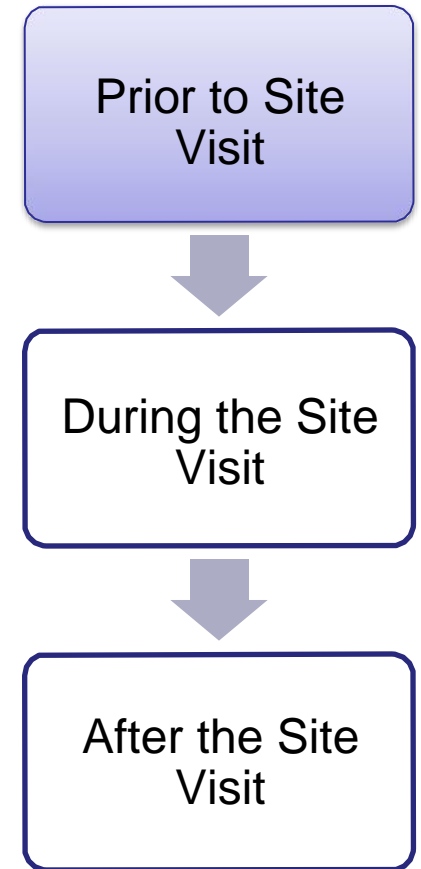


Factors for Selection

- Airports receiving (AIP) Federal funding
- Political (congressional) inquiries
- Significant, allegations or multiple complaints
- Geographic location, size and frequency of use
- Potential LEP Population
- Any projects that might have an EJ impact on communities
- Other impacts within or near the potential site selection

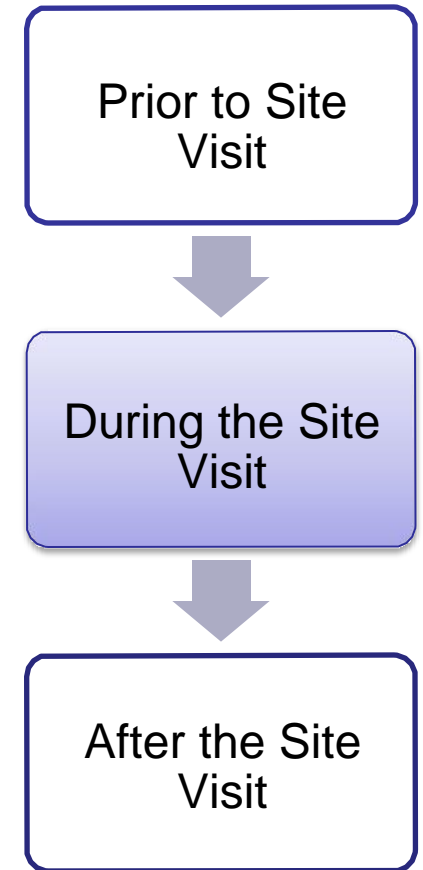
Prior to Site Visit

- Notify selected airport
- Request preliminary information
- Identify point of contact
 - Title VI Coordinator
- Coordinate Logistics
- Answer questions



During Site Visit

- Interview
 - Airport Director
 - Title VI Coordinator
 - Customer Service POC
 - Environmental Justice POC
 - FBO Managers
 - Sampling of Tenants
- Review Sampling of Contracts
- Tour Airport
- Provide Technical Assistance Training
- Conduct Exit Briefing



After Site Visit - FAA

After the Site
Visit
FAA

- FAA review team will provide:
 - Compliance report which includes
 - Findings
 - Required actions (as applicable)
 - Recommended best practices (as applicable)
 - Compliance Review Summary Table of required actions and recommended best practices
 - Due date for airport sponsor response (normally about 2 weeks)

After Site Visit – Airport Sponsor

- Provide responses to **each** required action and recommended best practice
 - Identify the action(s) the sponsor will take and the estimated closure date
 - Identify the action(s) the sponsor has completed and the actual closure date
 - When actions are completed provide an updated Compliance Review Summary Table to the FAA review team upon completion
 - Provide as support for completed actions, as appropriate
 - URLs for links
 - Copies of documents
 - Photos
- All responses **must** be on the Compliance Review Summary Table
- Contact FAA review team if you have any questions

Sample Compliance Review Summary Table

Sample International Airport (XXX)

Compliance Review Summary Table of Required Action(s) and Recommended Best Practice(s) as of December 20, 2013

Items in blue are to be completed by Airport Sponsor.

As items are closed, provide an updated table to Janet Long at janet.long@faa.gov upon completion.

	Reference	Requirement	Finding	Required Action(s)	Recommended Best Practice(s)	Estimated Closure Date for each action (date only)	Actual Closure Date for each action (date only)
1	49 CFR 21.9(b) 49 CFR 21, Appendix C(b)(3)	Records and Reports for Compliance	XXX does not have a system for collecting complaint records and was not aware of the requirement to submit complaints to the FAA within 15 days after receipt.	1. XXX must forward to the FAA all Title VI complaints of discrimination, including resolution efforts within 15 days after receipt.	1. XXX should consider creating a formal Title VI complaint form/process and post it on their website.		
Item 1: Airport response to each required action for this item. See note below.				1. XXX created a complaint process that specifies forwarding any Title VI complaints received to the FAA within 15 days after receipt.			1/15/14
Item 1: Airport response to each recommended best practice for this item. See note below.					1. XXX created a formal complaint process and is in the process of posting it to our website.	3/1/14	

NOTE: Identify action(s) taken by the airport for each required action and recommended best practice. Identify the date the action was completed. If item response references a link, mentions a document or indicates something has been posted (e.g. "Unlawful Discrimination" posters) – provide the URL, a copy of the document (if a large document the cover page, table of contents and relevant page(s) at a minimum) and pictures of where the item was posted.

FAA Title VI Program Staff

Name	Address	Contact
Michael Freilich Director of National External Operations Program	FAA Western-Pacific Regional Office Office of Civil Rights, AWP-9 15000 Aviation Blvd. Lawndale, CA 90260	310-725-3948 Michael.Freilich@faa.gov
Airport Nondiscrimination Compliance Program Team		
Janet Long (Lead) Team Lead	FAA National Headquarters Office of Civil Rights, Room 1030 800 Independence Ave, SW Washington, D.C. 20591	202-267-0124 janet.long@faa.gov
Cherry Smith	FAA Eastern Regional Office Office of Civil Rights, Room 217 159-30 Rockaway Blvd Jamaica, NY 11434	718-553-3299 cherry.smith@faa.gov
Shelly James-Msuya		718-553-3053 shelly.james-msuya@faa.gov
Julio Guadalupe		718-553-3297 julio.guadalupe@faa.gov

